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9 Attorney for Plaintiff, Demetrious Polychron

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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION

DEMETRIUS POLYCHRON

Case No.: 2:23-cv-02831-SVW-E

Plaintiff,

**DECLARATION OF KATIE
CHARLESTON IN SUPPORT OF
MOTION TO WITHDRAW
APPEARANCE**

vs.

JEFF BEZOS, et al.,

Defendants.

**DECLARATION OF KATIE CHARLESTON IN SUPPORT OF
MOTION TO WITHDRAW APPEARANCE**

1 I, Katie M. Charleston, declare as follows:

2 1. I am the attorney of record for Plaintiff Demetrious Polychron (“Plaintiff”).
3 I have personal knowledge of the matters contained in this declaration and, if called as a
4 witness to testify, I could and would competently testify to them.

5 2. There has been a significant breakdown in the attorney-client relationship in
6 that Plaintiff has been habitually unresponsive, and with looming deadlines, has become
7 even more unresponsive to the undersigned’s multiple attempts at contact.

8 3. On August 21, 2023, I attempted to reach Plaintiff via telephone and email.
9 No response was received from Plaintiff.

10 4. On August 28, 2023, I attempted to reach Plaintiff via telephone and email.
11 No response was received from Plaintiff.

12 5. On August 29, 2023, I attempted to reach Plaintiff via his client portal to
13 approve a pleading and no response was received.

14 6. On August 30, 2023, I instructed my staff to attempt to reach Plaintiff
15 regarding upcoming deadlines.

16 7. Despite this lack of communication from Plaintiff, I continued to secure his
17 interests by conferring with opposing counsel, drafting pleadings, notifying Plaintiff as
18 needed, and timely filing pleadings.

19 8. Plaintiff has been notified and is aware of the September 25, 2023, appellate
20 deadline relating to this Court’s entry of Judgment on August 25, 2023.

21 9. Plaintiff has been notified and is aware of the Defendants’ September 8, 2023,
22 filing deadline for their attorney fee motions.

23 10. Plaintiff has not provided payment for services rendered in over two months.

24 I declare under penalty of perjury under the laws of the State of California that the
25 foregoing is true and correct.

26 Dated: August 31, 2023

/s/ Katie Charleston

27 Katie Charleston, Esq.